

Appeal

The United States Court of Appeals for the Seventh Circuit

UNITED STATES DISTRICT COURT

For the Western District of Wisconsin

Iftikhar Ahmed Memon

Plaintiff,

Case No.: 14-CV-581-jdp

V

Western Technical College La Crosse

Defendants.

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PETER OPPENEER
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Iftikhar Ahmed Memon
413 Third Street South. Apt#5
Black River Falls, WI, 54615

March 29th 2016

The United States Court of Appeals for the Seventh Circuit
United States District Court
120 N. Henry Street, Room 320
Madison, WI 53703

Appeal

Dear Chief U.S. District Judge William M. Conley,

Brief of the plaintiff

I have filed the following lawsuit

Iftikhar Ahmed Memon
Plaintiff,
Case No.: 14-CV-581-jdp
Vs.
Western Technical College La Crosse
Defendants.

The above lawsuit went in favor of the defendant. Therefore, I am writing to you to appeal for a re-evaluation of the Summary Judgment which went against me. All I am asking for is a trial by jury which I have never been granted hitherto, in spite of the fact that I do indeed meet both the direct and indirect criteria for proving discrimination under Title VII.

Direct criteria for proving active, mass racism has been provided. Please read my appeal completely before rejecting it. See especially page 21 to 26 of my appeal.

There are two criteria which prove discrimination under the Title VII by using direct and indirect methods of proof. During the lawsuit, I maintain that I provided adequate proof of discrimination against me.

Here is the criteria of indirect methods.

To make out a *prima facie* case for such a claim, a plaintiff must show that: (1) he was a member of the protected class; (2) he was qualified for the position; (3) he was rejected for the position;

and (4) the position was given to an individual outside the protected class who was similarly situated or less qualified than he was. *Stockwell v. City of Harvey*, 597 F.3d 895, 901 (7th Cir. 2010).

I have met the above criteria. (1) I am member of a protected class; (2) I was qualified for the position; (3) I was rejected for the position; and (4) the position was given to an individual outside the protected class who was similarly situated or less qualified than myself.

The following are the Required Qualifications for the position of *Associate Dean - General Studies*:

1. Master's degree required (preferably in one of the departmental areas within general studies).
2. Minimum of two years full-time teaching experience (or 8 semesters part-time teaching) required, plus.
3. Minimum of four years' occupational experience (supervisory experience preferred) plus at least one year (2,000 hrs.) non-teaching occupational experience if degree is in a general education field, or two years (4,000 hrs.) directly related occupational experience if degree is outside general education.
4. Preferred candidates will have some additional training in higher education leadership.

Analysis Point by Point

1. Master's degree required (preferably in one of the departmental areas within general studies).

I offered direct evidence of both my educational achievements and my course work toward a doctoral degree within the Master of Arts Degree transcript from the University of Minnesota. I, however, did not specify the inclusive evidence of doctoral course work because it was neither specified, preferred nor required in the job description.

- A. Master of Art Degree: Education major and subprogram, Work, Community, and Family Education at the University of Minnesota.
- B. Master of Science Degree: S.A.U Tando Jam. Pakistan, Agricultural Economics.
- C. Bachelor of Science Degree: S.A.U Tando Jam. Pakistan, Agricultural Economics major, Sociology minor.
- D. Bachelor of Arts Degree: Sindh University. Pakistan, Political Science.

(These early qualification mine will increase the probability of the origin of my country)

2. Minimum of two years full-time teaching experience (or 8 semesters part-time teaching) required, plus.

I offered evidence of the following experiences to fulfill the WTC application requirement:

August 20th 2008- June 13, 2014. Black River Falls: Ho- Chunk Youth & Learning Center.

Teacher: (Full Time)

Under the Title V11: I was hired as a full-time teacher to tutor Native American students in Middle and High School on the behalf of the Ho-Chunk Government. I have taught Physics, Chemistry, Biology, Economics, American study, Social Studies and Mathematics. Carrying out administrative tasks related to students, such as student attendance, daily academic progress, and data entry. Performed the duties of Academic Advisor.

1995-1999. Sindh Agricultural University Tando Jam.

Lecturer: (Full Time)

Delivering lectures, • developing and implementing new methods of teaching to reflect changes in research; • designing, preparing and developing teaching materials; • setting and marking examinations; • completing continuous professional development (CPD) and participating in staff training activities; • Career Specialist. I also taught following Courses works as well as perform the duties of Academic Advisor First-Year students; Microeconomic and Macroeconomic, Economics of Poverty and Development, Economics of Social Problems.....

1986-1996 Director of St. Peter's English Learning Center Sindh, Sindh, Pakistan

I held this position for ten years and worked as the Director for 780 hours per year. I worked approximately 7,800 hours in ten years, because my hours on average were 15 to 21 per week for those ten years.

3. Minimum of four years' occupational experience (supervisory experience preferred) plus at least one year (2,000 hrs.) non-teaching occupational experience if degree is in a general education field, or two years (4,000 hrs.) directly related occupational experience if degree is outside general education.

a. "Minimum of four years' occupational experience (supervisory experience preferred)"

1986-1996 Director/Teacher of St. Peter's English Learning Center, Sindh, Pakistan

I held this position for ten years and worked as the Director for 780 hours per year. I worked approximately 7,800 hours in ten years, because my hours on average were 15 to 21 per week for those ten years. A director is a supervisory position. For example, the Assistant Principal of a school is a supervisory position.

Additionally, I have both domestic and international supervisory experience. I was Assistant Manager in the multi-million dollar establishment "Speedway Super American Gas Station". Speedway SuperAmerica Gas Station Eagan, Minnesota (Assistant Manager) Full Time: 5/2003 to 1/30/2004: I worked for 9 months. As an Assistant Manager, I was responsible of more than 100,000 dollars of acquisition and weekly sales.

Just like myself, Mr. Mark Carlson and Thornton, Mary Anna have invested more hour than Minimum of four years' occupational experience (supervisory experience preferred)

I invested more than 9240 hours. Which is beyond Minimum of four years' occupational experience (supervisory experience preferred).

However, I supervised less than 10 employees but Carlson supervised less than 60 employee and Thornton, Mary Anna supervised less than 35 employees.

Simply, each of us met "Minimum of four years' occupational experience (supervisory experience preferred)" with different strength.

Mr. Mark Carlson and Thornton, Mary Anna just had domestic supervisory experience than me but they did not have international supervisory experience at all. However, I hold more than minimum supervisory experience of domestic and international level, which is good for international college like WTC (Western Technical College La Crosses). I agree that Mr. Mark Carlson and Thornton Mary Anna has more experience of domestic supervisory experience but not internationally at all.

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¹¹ Carrie Ann Bruhlmann and Robert Leifeld met each component of required and preferred qualifications. They got and interview but no job. Those who do not meet preferred qualification got an interview and job!!

- b. **"Plus at least one year (2,000 hrs.) non-teaching occupational experience if degree is in a general education field. or two years (4,000 hrs.) directly related occupational experience if degree is outside general education."**

The following is my directly related occupational experience, or technical trade work experience for technical colleges:

Hutchinson Technology, Inc. Eau Claire, Wisconsin (Operator) 2/20/06, 2/1/2008

Visually inspect product attribute features to established acceptance criteria. Use of stereoscope for extended periods of time.

Mechanically inspect product dimensional variables using automated and manual measurement methods and machines.

Collect and enter data on inspected product.

Input data/information in required format into appropriate form.

Verify process control data (control charts, tables, run records, mfg. orders, etc.) meets customer requirements and take appropriate corrective action if needed.....

Uponor Warsbo. Apple Valley, Minnesota (Operator) 5/9/2004, 5/4/2005

Set up machines at the beginning of shift to ensure proper working order

Perform testing procedures to ensure that machines work optimally during the production procedures

Maintain and clean machines before and after each shift

Feed information akin to speed, shapes and sizes through the machine set up box

Place parts in semi-automated machines

Calibrate machines at the beginning of each shift

Recalibrate machines at the end of each shift

Monitor machines during every procedure to ensure optimum running

Provide relevant information regarding progress to supervisors and to train new employees too.

Speedway SuperAmerica Gas Station Eagan, Minnesota (Assistant Manager)

5/1/2003, 1/30/2004

Greet Customers with a smile, be friendly, and offer prompt service.

Practice the suggestive sell.

Thank customer.

Adhere to all city, county, state and federal alcohol and tobacco regulations.

Customer Transaction

Efficiently operate cash register making sure to ring all sales and managing cash and credit cards as directed by your manager.....

4. Preferred candidates will have some additional training in higher education leadership.

I concede that I do not have additional training in higher education leadership, but only leadership experience in Peter's English Learning Center Sindh Pakistan as a Director/ Teacher.

Note, however, that two other applicants who received interviews did NOT in fact have this experience either as corroborated in the Opinion and Order quoted below.

1. **FACT:** One of the candidates (Mark Carlson) was offered an interview. He did not have additional training in higher education leadership, nor did he have any experience teaching adult. His only experience was only teaching underage students. (see Carlson's Exhibit 25) In my opinion Carlson's cover letter was good, but not at all, his resume. A professional resume outside of the religious community should not reference one's religious faith. Carlson's resume talks about his passionate community activities promoting the Christian faith. (Exhibit 25. P. 8, paragraph 1-8). Now the laws of probabilities says that more than a few member of selecting committee or "The Team" were of Christian faith to offer him interview. Professional resume do not consist of one's religious activities. Because it would cause favoritism too. I agree that, Mr. Carlson is experienced organizer and has an experienced in strategic planning- Bethany Lutheran Church, Wisconsin Dells. (Exhibit 25. P. 8, paragraph 1-8).
2. **FACT:** Another candidate (Thornton, Mary Anna,) who was offered an interview and job too. She did not have additional training in higher education leadership. (Exhibit 26)

In the opinion and order 14-cv-581-jdp. Page 13. "The main focus of plaintiff's claim that the selection team's choices were pretextual is that Carlson and Thornton (who was ultimately hired), had equally weak preferred qualifications to plaintiff, yet received interviews anyway. Plaintiff concedes that he did not meet the preferred qualifications of training in higher education leadership. But he argues that neither Carlson nor Thornton did either. I cannot say as a matter of law that defendant is correct about its assessments of this qualification"

Let me address the fourth component of prima

(4) *"The position was given to an individual outside the protected class who was similarly situated or less qualified than he was. Stockwell v. City of Harvey, 597 F.3d 895, 901 (7th Cir. 2010)."*

Master's degree required. Master's degree was not preferred but it was required.

First I will talk about the range of her degrees or application of degrees of Mary Anna Thornton than I will compare with my degrees. Then you will know that I supersede than her.

First I will talk about her Bachelors of Art from 1979 to 1983. Her major was English Language and Literature.

In her Bachelors of Art; she had one course work of Gen Bio 11. "Gen Bio 11" should mean General Biology. She took this course 1981. (Exhibit 26, p. 12). She must have performed practical application of the course work of General Biology. She must have dissect worms, frogs, cats and rats.

Rest of her course work on English Literature. Such as:

Eng Romantic/Victorn,

20th Century Poetry,

Eng creative writing,

Brit Lit, Old English,

Medieval World,

Grammar Review and list goes on.

Now I will talk about her Master's degree in Educational Technology. She said in job application that she has earned Master's in Education Technology. But I cannot able to talk the range of her degree because her degree certificate and transcript were not included in job application. Even though, I request defense to during discovery to send me all credentials. But Defense did not send me at all.

Now I will talk about her the range of Master's and PhD degree in Anthropology.

Meaning of Anthropology:

Anthropology is the scientific study of the origins of humans, how we have changed over the years, and how we relate to each other, both within our own culture and with people from other cultures. www.vocabulary.com/dictionary/anthropologist

Following her coursework of Master's and PhD degree in Anthropology

Topics in Anthropology

Anthropology Logic

Independent study

Biol Human Soc

African religions

Independent study

Arch Prelit Soc

Hist of Anthro
 Beliefs and Values
 Topics in Anthropology
 History of Anthropology
 Independent study
 Psych Anthropology Ethno Analysis
 Anthropology Women
 Topics in Anthropology
 Independent study and list goes on.....

Now Western Technical College La Crosse offer following course work. Mary Anna Thornton's Master's and PhD degree in Anthropology has minimum impact on following technical trades:

Western Technical College La Crosse was never been interested to find the origin of Human Being. However, they want to offer interview and job to those who invest most of their education achievement to seek origin of Human.

What is inside the Master's and PhD degree is important. People can earn Master's and PhD degree in Islam from Pakistan. People can earn Master's and PhD degree in History or PhD in Theology. People can earn Master's and PhD degree in Anthropology. PhD is PhD but Western Technical College La Crosse does not want to see the impact of Master's and PhD of Anthropology into their following course work.

Western Technical College La Crosse offer following course work

Sort Alphabetically

Agriculture, Food, and Natural Resources

Agri-Business Science
Animal Science-Internal Certificate
Catering Certificate-Internal Certificate
Culinary Management
Dietary Mgr/Food Serv Sup-Internal Certificate
Farm, Bus & Production Mgmt
Food Production Specialist
Horticultural Plant Health Care Pathway Certificate
Landscape Horticulture
Landscape Technician Embedded Technical Diploma

Architecture, Graphics, and Design

Architectural Technology
CAD Technician
Desktop Publishing-Internal Certificate
Graphic Design
Landscape Horticulture
Mechanical Design Technology
Visual Communications
Web Design-Internal Certificate

Associate in Science

Advanced University Studies-Internal Certificate

Assc of Science, Liberal Arts

University Studies-Internal Certificate

Business and Information Technology

Accounting

Accounting Assistant

Administrative Professional

Business Management

Computerized Accounting-Internal Certificate

Customer Service Representative Pathway Certificate

Database Basics and Beyond-Internal Certificate

Entrepreneurship-Internal Certificate

Finance

Financial Services

Frontline Services Pathway Certificate

Graphic Design

Health Office Assistant Pathway Certificate

Health Office Professional Embedded Technical Diploma

Human Resource Management

Human Resources-Internal Certificate

IT - Computer Support Tech

IT- Network Systems Administration

IT Network Systems Technician

IT-Computer Support Spec

IT-Web & Software Developer

Leadership & Supervision Professional Embedded Technical Diploma

Leadership Essentials Embedded Technical Diploma

Marketing

Marketing Certificate-Internal Certificate

Medical Admin Professional

Microsoft Office Advanced-Internal Certificate

Microsoft Office Basic-Internal Certificate

Office Support Specialist

OSHA-Internal Certificate

Paralegal

Sales Management

Sales Representative Embedded Technical Diploma

Soft Skills-Internal Certificate

Supervisory Management

Visual Communications

Education and Human Services

Early Childhood Education

Human Services Associate

Instructional Assistant-AD

Instructional Assistant-TD

YoungStar-Internal Certificate

Engineering and Technology

Air Conditioning, Heating & Refrigeration
Architectural Technology
Basic Machining Embedded Technical Diploma
Bio-Medical Electronics
Building Systems Technology
CNC Operator-Internal Certificate
CNC Programmer-Internal Certificate
CNC Setup-Internal Certificate
Electrical & Computer Engineering Technology - CET
Electrical & Computer Engineering Technology - EET
Electromechanical Maintenance Technician Embedded Technical Diploma
Electromechanical Technology
Electronic Systems Installation & Maintenance - FIC
Electronic Systems Installation & Maintenance - IEM
Machine Tool Operation
Mechanical Design Technology
Health/Behind-the-Scenes

Bio-Medical Electronics
Central Service Technician
Health Information Technology
Medical Admin Professional
Medical Coding Specialist
Medical Lab Technician
Pharmacy Technician
Phlebotomy-Internal Certificate
Health/Direct Patient Care

Advanced EMT Certificate
Dental Assistant
Emergency Medical Technician-Basic Certificate
EMT - Paramedic
Gerontology-Internal Certificate
Medical Assistant
Nursing Assistant
Nursing-Associate Degree
Occupational Therapy Asst
Paramedic Technician
Pharmacy Technician
Phlebotomy-Internal Certificate
Physical Therapist Assistant
Practical Nursing
Radiography
Respiratory Therapist
Surgical Technology
Therapeutic Massage
Mechanical

Air Conditioning, Heating & Refrigeration
Automotive Maintenance & Light Repair Technician-Level 1 Technical Diploma
Automotive Service Technician-Level 2 Technical Diploma
Automotive Technician

Basic Industrial Power Embedded Technical Diploma
Basic Welding Embedded Technical Diploma
Building Systems Technology
CAD Technician
Diesel & Heavy Equipment Technician
Diesel and Heavy Equipment Technician Assistant Embedded Technical Diploma
Electromechanical Technology
Electronic Systems Installation & Maintenance - FIC
Electronic Systems Installation & Maintenance - IEM
Industrial Mechanical Maintenance Technician Embedded Technical Diploma
Manufacturing Systems Maintenance Technician Technical Diploma
Refrigeration, Air Cond & Heating Svc Tech
Welding
Wood Tech
Public Safety

Advanced EMT Certificate
Criminal Justice
Criminal Justice - Law Enforcement Academy
Emergency Medical Technician-Basic Certificate
EMT - Paramedic
Fire Protection Technician
Paramedic Technician

Before I write range my degrees, I would like to write a few words about Educational system of Pakistan which is based on British system of education.

Brief Educational system of Pakistan

I am Pakistani American and I feel like explaining the education of system of Pakistan. In Pakistan, there is Theory and Practical start from 9th grade. In order to earn High School diploma or university degree, then each student has to perform practical then in the end of year, he/ she has to come across the oral exam to defend their practical application of their subject matter.

If a student fails practical work then he/she will not be awarded a degree or even a High School diploma. Therefore, each student has to earn passing grades at least in Theory as well as Practical.

Each practical work clearly stated in my Pakistani transcript of Bachelor of Science Degree from Social Sciences faculty: Agricultural Economics major, Sociology minor. However, I feel like explaining following my practical application experience of technical trades so that you understand the significance of my practical applications of theoretical knowledge.

However, my exceptional practical application of technical trades is as followed: Following experiences were not paid nor voluntarily, but student pays in shape tuition fee. I shall write the fraction of practical applications of my theoretical knowledge

1989-1990. Sindh Agriculture University, Tando Jam, Pakistan (Part Time)**Entomology/Mycolology: Practical of Entomology department**

Study of fungi, including their genetic and biochemical properties and their taxonomy. Find anywhere types of fungi and write classification into an especial note book.

Capture more than 70 insects without squishing them. Pinning the specimen on the soft wooden board. Identify insects and their eating habits, write their local names, technical names and botanical names.

Learn and teach at least three or four fellow student only about Entomology. So that you can defend your practical work in a final oral exam.

Describe the different developmental stages for e.g. shoots fly eggs, larva, pupa & adult is important for correct identification of the pest.

Write down insecticides and pesticides to eliminate the threat.

1989-1990. Sindh Agriculture University, Tando Jam, Pakistan (Part Time)**Horticulture/ Practical of Horticulture department**

Under the supervision of world level scientist of Horticulture. Students will manage the soil, or make proper beds for plantation of the plant. And also learn and teach at three or four fellow student only about Horticulture. So that student can defend your practical work in a final oral exam.....

1989-1990. Sindh Agriculture University, Tando Jam, Pakistan (Part Time)**Agriculture & Extension/ Practical of Agriculture Extension department**

Application teaching method in agricultural field through T&V system. The student may visit an agriculture land with Agriculture & Extension workers and learn how T&V system could be applied.

Students are required to write all methods of Visiting and Teaching farmers who cannot read and write. During this practical: student learns which herbicides, pesticides, insecticide and rodenticides may be used. And the advance method of using fertilizer. And also learn and teach at three or four fellow student only about T&V system.

1989-1990. Sindh Agricultural University Tando Jam Pakistan (Part Time)**Soil Science/ Practical of Soil Science department**

Students will collect the soil symbols and run the testing of soil into soil profile equipment. Students will identify minerals, rocks, stones, metals and their hardness. And also learn and teach at least three or four fellow student only about Soil Science.....

1992-1993. Sindh Agricultural University Tando Jam Pakistan (Part Time)

Academic Suggestions/ Practical of rural sociology department.

Presented classes to diverse High School students and mostly freshmen undergraduate students in order to generate the skills and motivation to acquire higher education..... Through our 1000 years of old culture and civilization.....

1989-1990. Sindh Agricultural University Tando Jam Pakistan (Part Time)

Plant Breeding & Genetics/ Practical of crop production department

Students learn the art of Grafting and Budding under the direct supervision of Plant Breeding & Genetics Scientist or a professor. Each student learns to agricultural field.....

1990-1990. Sindh Agricultural University Tando Jam Pakistan (Part Time)

Plant Pathology/ Practical of crop protection department

Physiological plant disorders

Natural: Drought, frost damage, breakage by snow, hail, flooding and poor drainage

Man-made Soil compaction, Pollution of air, soil, or both, Herbicide over-application

Student could go individually or in group to different fields of agriculture crops to identify plant diseases caused by pathogens.....

1989-1990. Sindh Agricultural University Tando Jam Pakistan (Part Time)

Animal Husbandry/ Practical of Department of Animal Husbandry

All students will learn animal diseases: Such as foot and mouth diseases among the cows and the list goes on. The student will not perform surgery, but they will stand next to surgeons.....

1990-1990. Sindh Agricultural University Tando Jam Pakistan (Part Time)

Agronomy/ Practical of Department of Agronomy

We students learn through practical application to improve the use of soil and increase the production of food and fiber crops. It is very vast field of agriculture because we learn crop rotation, irrigation and drainage, plant breeding, soil classification, soil fertility, weed control, and other areas.....

My Masters degrees course work with and without practical application:

Method to Change Develop Countries/ No practical but only research work.

Extension Program Development/ No practical but only research work.

Current issues/ No practical but only research work.
 Admin Extension Education/ No practical but only research work.
 Econ Development/ No practical but only research work.
 Positivist Research/ No practical but only research work.
 Research Agri Education/ No practical but only research work.
 Work family community/ No practical but only research work.
 Ecological Anthropology/ No practical but only research work.
 Applied Intel Dev Education/ No practical but only research work.
 Strategies to teach adult/ with practical but only research work.
 Education through Extension Method/ No practical but only research work.
 Program Evaluation/ Intel Dev Education but only research work.
 Intel Education development/ Intel Dev Education but only research work.
 Advanced Agricultural Marketing/ Practical Department of Agricultural Economics.
 Economics to Agricultural Labor/ / Practical Department of Agricultural Economics.
 Agricultural Banking and Credit / Practical Department of Agricultural Economics.
 Econometrics/ / Practical Department of Agricultural Economics.
 Peasant Economy/ / Practical Department of Agricultural Economics.

Principle Economics/ / Practical Department of Agricultural Economics.
 Land Economics/ / Practical Department of Agricultural Economics.
 Farm Power and Machinery/ / Practical Department of Agricultural Economics.
 Farm Management/ / Practical Department of Agricultural Economics.
 Micro Economics/ / Practical Department of Agricultural Economics.
 And list goes on of above technical trades experiences.

It is fact that: My bachelors of Science and Masters of Science degrees and Masters of Arts has better practical application of technical trades than Thornton, Mary Anna's educational degree in Master's and PhD degree in Anthropology.

It is fact that: Western Technical College La Crosse offer also following list of programs which is 100% related with my practical application of research and theories of my bachelors of Science and Masters of Science degree

Agri-Business Science
Animal Science-Internal Certificate
Farm, Bus & Production Mgmt
Food Production Specialist
Horticultural Plant Health Care Pathway Certificate
Landscape Horticulture
Architecture, Graphics, and Design
Landscape Horticulture
Associate in Science
Advanced University Studies-Internal Certificate
Assoc of Science, Liberal Arts
Business and Information Technology

Business Management

Finance

Financial Services

Marketing

Marketing Certificate-Internal Certificate

It is fact that: Following my directly related occupational experience or technical trades work experience far better related to the concept of technical colleges or colleges which provide technical trade.

Hutchinson Technology, Inc. Eau Claire, Wisconsin (Operator) 2/20/06, 2/1/2008

Visually inspect product attribute features to established acceptance criteria. Use of stereoscope for extended periods of time.

Mechanically inspect product dimensional variables using automated and manual measurement methods and machines.

Collect and enter data on inspected product.....

Uponor Warsbo. Apple Valley, Minnesota (Operator) 5/9/2004, 5/4/2005

Set up machines at the beginning of shift to ensure proper working order

Perform testing procedures to ensure that machines work optimally during the production procedures

Maintain and clean machines before and after each shift

Feed information akin to speed, shapes and sizes through the machine set up box.....

Speedway SuperAmerica Gas Station Eagan, Minnesota (Assistant Manager) 2/2003 to 1/30/2004:

Greet Customers with a smile, be friendly, and offer prompt service.

Practice the suggestive sell.

Thank customer.

Adhere to all city, county, state and federal alcohol and tobacco regulations.

Customer Transaction

Efficiently operate cash register making sure to ring all sales and managing cash and credit cards as directed by your manager.....

Thornton, Mary Anna have Master's and PhD of Anthropology. Anthropology degree has minimum impact in Technical College. Students can have Master's and PhD in **Theology. But Theology has minimum impact in Technical Colleges.**

Therefore, Under the light of above facts, I clearly met indirect criteria that: I am member of a member of the protected class; (2) I was qualified for the position; (3) I was rejected for the position; and (4) And the position was given to an individual outside the protected class who was

similarly situated or less qualified than myself. *Stockwell v. City of Harvey*, 597 F.3d 895, 901 (7th Cir. 2010).

(My educational application has direct relationship of hands on experience with technical course work offered by WTC, Western Technical College La Crosse)

My course work of my degrees has practical application of theories and research which supersede from all four non-protected class candidates whom WCT offered an interview. My exceptional practical application of technical trades are as above.

Practical application means hands on training.

Now I prove discrimination under the V11 by using direct Method.

Master of Art Degree: Education major and subprogram, Work, Community, and Family Education at the University of Minnesota.

Master of Science Degree: S.A.U Tando Jam. Pakistan, Agricultural Economics.

Bachelor of Science Degree: S.A.U Tando Jam. Pakistan, Agricultural Economics major, Sociology minor.

Bachelor of Arts Degree: Sindh University. Pakistan, Political Science. (These early qualification mine will increase the probability of the origin of my country)

My first three educational degrees were from Islamic Republic of Pakistan. It increase the probability that individual is from Pakistan origin.

My Pakistani transcript of Bachelor of Science Degree and Master's degree clear stated my religion Islam. (Exhibit 5). I do not know why Islamic Republic of Pakistan write the religion in academic transcripts and degrees.

Direct evidence of Mass Racism Practice by Western Technical College La Crosse

The Diversity Data of Full Time Teachers of WTC: The data shows that WTC has zero (0) Full Time Asian American Male Teacher and 95 White Male Teachers.

The Diversity Data of Full Time Teachers of WTC: The data shows that WTC has zero (0) Full Time Asian American Female Teacher and 107 White Female Teachers.

The Diversity Data of Full Time Teachers of WTC: The data shows that WTC has zero (0) Full Time African American Male Teacher and 95 White Male Teachers.

The Diversity Data of Full Time Teachers of WTC: The data shows that WTC has zero (0) Full Time African American Female Teacher and 107 White Female Teachers.

The Diversity Data of Full Time Teachers of WTC: The data shows that WTC has zero (0) Full Time Hispanic Male Teacher and 95 White Male Teachers.

The Diversity Data of Full Time Teachers of WTC: The data shows that WTC has zero (0) Full Time Hispanic Female Teacher and 107 White Female Teachers.

The Diversity Data of Full Time Teachers of WTC: The data shows that WTC has zero (0) Full Time Native Americans Male Teacher and 95 White Male Teachers.

The Diversity Data of Full Time Teachers of WTC: The data shows that WTC has zero (0) Full Time Native Americans Female Teacher and 107 White Female Teachers.

The Diversity Data of Full Time Exec/Adm Mgr of WTC:

The data shows that WTC has zero (0) Full Time Native American male in Exec/Adm Mgr

The data shows that WTC has zero (0) Full Time Native American Female in Exec/Adm Mgr

The data shows that WTC has zero (0) Full Time Asian male in Exec/Adm Mgr

The data shows that WTC has zero (0) Full Time Native American female in Exec/Adm Mgr

The data shows that WTC has zero (0) Full Time African American male in Exec/Adm Mgr

The data shows that WTC has zero (0) Full Time African American female in Exec/Adm Mgr

The data shows that WTC has zero (0) Full Time Hispanic male in Exec/Adm Mgr

The data shows that WTC has zero (0) Full Time Hispanic female in Exec/Adm Mgr

In opinion and order 14-cv-581-jdp. Page 18. Court of law stated that. "At best, it shows that defendant hired administrators and faculty members at only slightly lower percentages than their presence in the labor force".

The Diversity Data of Full Time Exec/Adm Mgr of WTC: Shows 56 totally officer in the field of leadership are white male and females.

The Diversity Data of WTC: shows that:

WTC conducted mass Discrimination against Asian American males

WTC conducted mass Discrimination against Asian American Muslims

WTC conducted mass Discrimination against Pakistani American

WTC conducted mass Discrimination against Asian American

WTC conducted mass Discrimination against those Asian Americans who are above the age 40.

Apart from white folks: WTC conducted mass discrimination against every race existing in the United States of America

In opinion and order 14-cv-581-jdp. Page 17 Court of law stated that, ***“Plaintiff received some updated statistics in response to his requests for admission. In particular, defendant admitted that there were zero full time Native American, Asian, and African American, or Hispanic employees in the “Exec/Adm Mgr” category at the time plaintiff submitted his application, February 2014. As of May 2015, defendant still had no “Exec/Adm Mgr” employees who were Native American, Asian, or African American, but at least one employee who was Hispanic (defendant denied that there were zero but did not specify how man Hispanic employees it had).***

Defendant’s responses to plaintiff’s requests for admission about faculty were more ambiguous, as defendant denied having zero full time Asian American male, Asian American female , African American male, African American female, Native American male, and Native American female faculty members (plaintiff did not ask about Hispanic faculty members).

Again, defendant does not explain how many more employees than zero they had for each category. I will give plaintiff the benefit of the doubt with regard to any ambiguity in this data and assume that when defendant denies that there are zero employee of a certain racial group, it means that there is only one”.

There are 190 cities in the State of Wisconsin

Western Technical College, La Crosse, is in the 12th largest city of the state. La Crosse has population of more than 50,000; WTC has only hired white folks.

La Crosse County, Wisconsin Population: 116,713 (2013)

It is exceptionally clear that, defendant practice mass racism in tax payers funded college. The sickening act is that; the city government of Lacrosse, county government of Lacrosse, state government of Wisconsin and federal government of United States utilize tax dollars on the well-being of only White people, which is crystal clear in above data.

Above data clearly shows WTC practices mass racism. Above data clearly shows that WTC do not want Asian American Muslim into their teaching workforce and or Exec/Adm Mgr work force. It is direct evidence of mass racism against Asian American Muslim folks and rest of minorities

Therefore, I appeal to you that reevaluate my Case No.: 14-CV-581-jdp. And allow me to speak towards Jury, which I asked on the first place.

History

Let me start out by introducing myself. My full, official name is Iftikhar Ahmed Memon. I was born and raised in the Islamic Republic of Pakistan. In other words, however, I am naturalized citizen of the United States of America. I am a 47 year old Muslim, Pakistani, American male.

I have been applying for jobs since 2003. I have applied for more than 7,000 jobs across the United States of America. I have been awarded, however, only three interview out more than those 7000 jobs. I got two interviews within last five months, because (I sense) I copied and pasted the pictures of Martin Luther King, Jr. and Rosa Parks in my cover letters.

I filed following lawsuits

Lawsuit number 1. (October 2013)

UNITED STATES DISTRICT COURT
For the Western District of Wisconsin

Iftikhar Ahmed Memon
Plaintiff,
Case No.: 13-CV-704 jdp
V

Waukesha County Technical College
Defendants

1. List of positions that I have applied with WCTC and they never offered me an interview

On 06/11/12: Instructor of Economics (I met required and preferred qualification of following jobs by 99%)

On 09/05/12: Instructor of Economics (I met required and preferred qualification of following jobs by 99%)

On 03/14/13: Instructor of Economics (I met required and preferred qualification of following jobs by 90%)

May 17th 2008: Communication Skills Instructor.

This was very attention-grabbing case.

1. I did prove that I met preferred and required qualification above jobs like one other candidate.
2. During this discrimination lawsuit against Waukesha County Technical College; Defendants temper the most important documents. Only that document showed that I was not only equally qualified by one candidate but more qualified than him.
3. Data released by Waukesha County Technical College itself.
“The Diversity Data of Full Time Teachers of WCTC: The data shows that WCTC has zero (0) Full Time Asian American Male Teacher and 95 White Teachers”.
Ratio is 0 to 95. This ratio shows mass passive racism:
4. During this discrimination lawsuit: Defendant sought out my personal information by asking illegal questions. I requested court of law to seal that information. And federal court of law did seal that information to protect my life.
5. However, summary judgment went into the favor of Waukesha County Technical College.

Not only myself but also majority of Asian folks, African folks and people of Arm forces of United States of America never got interview by Waukesha County Technical College.

- A. Application of Pakistani permanent residence of United States of America. **(Exhibit 29)**
Out of 95-percentage probability that this candidate is Pakistani origin because, his/her bachelor's and Master's degree was awarded in Pakistan.

Graduated with Doctorate in Economics from Wayne State University U.S.A

Master's in Economics from International Islamic University, Islamabad, Pakistan.

Bachelor's in Mathematics and Statistics, Punjab University, Lahore, Pakistan 1986.

I calculated his or her years of teaching experience, which around 11 years. He or she has domestic and international experience.

This Pakistani American met required and preferred qualification by 100%. But WCTC not offered an interview.

B. Application of Vietnam era Veteran. His or her application says that he/she was in Vietnam era Veteran (Exhibit 30)

Master's in Economics from University of Nevada, Las Vegas

Bachelor's in Economics and Mathematics from University of Nevada, Las Vegas

Approximately he or she holds 28 years of teaching experience. This is breath taking experience

This Vietnam era Veteran met required and preferred qualification by 99%. But WCTC not offered an interview.

C. Application of Chinese American (Exhibit 31) Out of 95-percentage probability that this candidate is China origin because; his bachelor's degree was awarded in China.

Graduated with Doctorate in Economics from University of Nebraska–Lincoln U.S.A

Master's in Computer Science, University of Nebraska–Lincoln U.S.A

Bachelor's in Agricultural Economics, Northwestern A & F University, China

Approximately he or she holds 6 years of teaching experience

This Chines American met required and preferred qualification by 99% But WCTC not offered an interview.

D. Application of Libyan permanent residence of United States of America. (Exhibit 32)

Out of 95-percentage probability that this candidate is Libya origin because, his/her bachelor's degree was awarded in Libya.

Graduated with Doctorate in Economics from Southern Illinois University Carbondale. U.S.A.

Master's in Applied Economics, San Diego State University CA. U.S.A.

Master's in Economics from Yarmouk University, Irbid, Jordan.

Bachelor's in Economics from University of Benghazi Libya.

Approximately he or she holds 5 years of teaching experience

He or she also met required and preferred qualification by 99% But WCTC not offered an interview.

E. Application of Indian American. (Exhibit 33) Out of 95-percentage probability that this candidate is Indian origin because, his/her bachelor's degree was awarded in India.

Graduated with Doctorate in Public Policy Program from University of Arkansas U.S.A

Master's in Agricultural Economics, from University of Arkansas U.S.A

Master's in Law from University of Arkansas, School of Law. U.S.A

Bachelor's of Laws LL.B from University of Delhi

Bachelor's of English Literature from University of Delhi, Lady Shriram College India

Approximately he or she holds 10 years of teaching experience

He or she also met required and preferred qualification by 99%. But WCTC not offered an interview.

He or she also applied this job twice. Exhibit 25

Data released by Waukesha County Technical College itself.

The Diversity Data of *Full Time Teachers* of WCTC: The data shows that WCTC has zero (0) Full Time Asian American Male Teacher and 95 White Teachers.

Ratio is 0 to 95. This ratio shows passive racism:

WCTC informally ban Asian Americans

The Diversity Data of *Full Time Teachers* of WCTC: The data shows that WCTC has zero (0) Full Time Asian American who is above the age 40. Tax payers WCTC has serious problem with Asian American who are above the age of 40 like myself.

American Indian/Alaskan Native

The Diversity Data of Full Time Teachers of WCTC: The data shows that WCTC has zero (0) Full Time Native American Female Teacher and 116 White Female Teachers.

Ratio is 0 to 116. This ratio shows passive racism:

Lawsuit number 2. (June 2014)

UNITED STATES DISTRICT COURT
For the Western District of Wisconsin

Iftikhar Ahmed Memon
Plaintiff,
Case No.: 14-CV-243-jdp
V
Chippewa Valley Technical College
Defendants.

List of positons that I have applied with WCTC.

1. I have applied for the position of Staff Development Coordinator in July 26, 2004. I met qualification by 100%. **They did not bother to offer me an interview.**
2. I have applied for the position of Staff Development Coordinator in July 2005. I met qualification by 100%. **They did not bother to offer me an interview.**
3. I have applied for the position of Social Science Instructor in October 2007. I met qualification by 100%. **They did not bother to offer me an interview.**
4. I have applied for the position of Agriscience Instructor on October 2007. I met qualification by 100%. **They did not bother to offer me an interview.**
5. On 01/22/13. I applied for Associate Dean-Business at Chippewa Valley Technical College. I met qualification by 100%. **They did not bother to offer me an interview either** and I end up filing lawsuit, which goes into the favor of CVTC.
6. CVTC knew my extreme personal information because Waukesha County Technical College shared that information to CVTC. Both lawsuits were going simultaneously.
7. During the lawsuit CVTC sent me blank form to sign it. Of course I refused to sign.

8. When I asked that why CVTC (Chippewa Valley Technical College Wisconsin) did not offer me any interview for the position of **behavioral Social Science Instructor**. CVTC said, "CVTC were looking for candidate with Pure Economics" CVTC fooled me: Over the years, I have visited several universities to seek information regarding degree of Pure Economics. Sadly, there is no such degree Pure Economics. CVTC made me fool.
9. Here are true and disturbing facts issued by CVTC College itself of their practices of Mass racism. It is 103 years old Chippewa Valley Technical College exists in the city of Eau Claire. Each Claire is the 9th largest cities in Wisconsin and it consist of 65, 000 residents.

The Diversity Data of Full Time Teachers of CVTC: The data show that CVTC has zero (0) Full Time Asian American Male Teacher and 101 White Teachers.

The Diversity Data of Full Time Teachers of CVTC: The data show that CVTC has one (1) Full Time Asian American Female Teacher and 112 White Female Teachers.

The Diversity Data of Full Time Teachers of CVTC: The data show that CVTC has two (2) Full Time African American Female Teacher and 112 White Female Teachers.

The Diversity Data of Full Time Teachers of CVTC: The data show that CVTC has (0) Full Time African American male Teacher and 101 White male Teachers.

The Diversity Data of Full Time Teachers of CVTC: The data show that CVTC has (0) Full Time Native American female Teacher and 112 White female Teachers.

The Diversity Data of Full Time Teachers of CVTC: The data show that CVTC has (1) Full Time Native American male Teacher and 101 White male Teachers.

103 years old Chippewa Valley Technical College exists in the city of Eau Claire. Each Claire is the 9th largest cities in Wisconsin and it consist of 65, 000 residents.

Your's Very Truly



Hukhar Ahmed Memon

"Country Must Fight 'Impulse to Call Johnny Back for a Job Interview But Not Jamal". Barack Hussein Obama.

“It's the action, not the fruit of the action, that's important. You have to do the right thing. It may not be in your power, may not be in your time, that there'll be any fruit. But that doesn't mean you stop doing the right thing. You may never know what results come from your action. But if you do nothing, there will be no result.”

Mahatma Gandhi

CC: Iftikhar Ahmed Memon

CC: Ellen M. Frantz Attorney

CC: U.S. District Court for the Western District of Wisconsin. The United States Court of Appeals for the Seventh Circuit.

CC: Jenny R. Yang: I will mail you when I have money to print all pages.

CC: Supervisor Amy Russell, Milwaukee Equal Rights Officer Section. I will mail you when I have money to print all pages.

CC: Dr. Amit P. Kulkarni MD: I will mail you when I have money to print all pages. These lawsuits and discriminatory establishments cause nerve-racking stress in my life.

CC: Michael Serch: Department of Behavioral Health. I will mail you when I have money to print all pages. These lawsuits and racist establishments cause nerve-racking stress in my life.

CC: U.S Department of Justice. I will mail you when I have money to print all pages.